

# United States District Court

**SOUTHERN**

DISTRICT OF

**TEXAS**

McALLEN DIVISION

UNITED STATES OF AMERICA

V.

## CRIMINAL COMPLAINT

Roberto Treviño

YOB: 1978

Principal

United States District Court  
 Southern District of Texas  
 FILED

Case Number:

United States

Gladys Muñoz

YOB: 1976

Co-Principal

MAY 31 2018

M-18-1147 -M

United States

Clerk of Court

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about May 29, 2018 in Hidalgo County, in the Southern District of Texas defendants(s) did,  
 (Track Statutory Language of Offense)

knowing or in reckless disregard of the fact that Willy Gonzalez-Alvarado, Juan Humberto Cordero-Ordóñez, and Bernabe Ancelmo Perez-Romero, citizens of Guatemala, along with nineteen (19) other undocumented aliens for a for a total of twenty two (22), who had entered the United States in violation of law, did knowingly transport, or move or attempt to transport said aliens in furtherance of such violation of law within the United States, that is, from a location near Havana, Texas to the point of arrest near La Joya, Texas,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) FELONY

I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

On May 29, 2018, a camera operator advised agents he observed several subjects running north away from the brush near the intersection of Military Highway and Patricio Perez Road, in Havana Texas. This area is frequently used by smugglers for alien smuggling and is approximately one mile away from the Rio Grande River.

SEE ATTACHED

Continued on the attached sheet and made a part of this complaint

☒ Yes ☐ No

Signature of Complainant

Salvador Mendez Senior Patrol Agent

Printed Name of Complainant

Sworn to before me and subscribed in my presence,

May 31, 2018

Date

at McAllen, Texas

City and State

Scott J Hacker, U. S. Magistrate Judge

Name and Title of Judicial Officer

Signature of Judicial Officer

5/31/18  
 Approved by  
 J Lynn Wang

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN, TEXAS**

**ATTACHMENT TO CRIMINAL COMPLAINT:**

**M-18-1147 -M**

**RE: Roberto Treviño  
Gladys Muñoz**

**CONTINUATION:**

Shortly thereafter, the camera operator observed two white sedans departing near the area where the subjects were last seen running. The camera operator then observed the two vehicles traveling north and eventually turning east onto Highway 83. Agents responded and observed the aforementioned white sedans later identified as a white Toyota Corolla and a white Nissan Sentra. The agent proceeded to follow the Corolla and observed it was riding low and appeared to be over capacity. The camera operator advised the agent, that he was behind the same Corolla he had previously called out. At this time, the agent activated his vehicle's emergency equipment and conducted a vehicle stop near the intersection of Leo Avenue and Highway 83, in La Joya, Texas. Shortly thereafter, a La Joya Police officer arrived on scene and the agent advised the officer of the other white sedan's direction of travel and possible involvement in alien smuggling.

The agent then approached the Corolla and identified the driver as Roberto TREVINO, a United States Citizen. TREVINO freely blurted out "I was only giving them a ride". Five additional occupants were determined to be illegally present in the United States. Moments later, a La Joya Police Officer requested assistance from Border Patrol on a traffic stop he conducted on a white Nissan Sentra with several passengers suspected of being illegal aliens. Additional agents made contact with the officer and the officer stated he had conducted a traffic stop on the Sentra for "Following to Close". Agents identified the driver as Gladys MUNOZ, a United States Citizen. Four additional occupants were determined to be illegally present in the United States. All subjects were placed under arrest and transported to the Border Patrol Station for processing.

NOTE: As Roberto Trevino was being transported to the Border Patrol Station, an agent overheard him say, "Fuck, and I was going to get paid \$400 (USD) for this".

**PRINCIPAL STATEMENT**

Roberto Trevino, a United States Citizen, was read his Miranda Rights and refused to provide a statement without an attorney present.

**PRINCIPAL STATEMENT 2**

Gladys MUNOZ, a United States Citizen, was read her Miranda Rights, and agreed to provide a statement.

MUNOZ stated she and her fiancé TREVINO were cleaning a house they were going to rent near Havana, Texas. MUNOZ stated she observed several illegal aliens towards the back of the house and moments later, a female subject approached her asking for a ride. MUNOZ stated she decided to call the property owner to inform him of the illegal aliens. MUNOZ claims the property owner instructed her to give them a ride and would pay her \$200 (USD). MUNOZ stated she informed TREVINO of what the property owner said to her and they both agreed to give them a ride to a local store. MUNOZ claims she transported approximately four illegal aliens in her Nissan Sentra and several others were being transported by TREVINO in a Toyota Corolla.

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN, TEXAS**

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Gladys Muñoz**

**CONTINUATION:**

**MATERIAL WITNESS 1**

Willy GONZALEZ-Alvarado, a citizen of Guatemala, was read his Miranda Rights and agreed to provide a statement.

GONZALEZ stated his mother made his smuggling arrangements and was to pay \$16,000 Quetzals. GONZALEZ stated he crossed the river by raft with approximately 19 other individuals. Once in the United States, GONZALEZ claimed a foot guide instructed them to board a white car that was already waiting for them. After they boarded the car, GONZALEZ stated the driver instructed them to wipe the sweat off their faces. GONZALEZ stated when they were pulled over, the driver instructed them to say he was just giving them a ride.

**MATERIAL WITNESS 2**

Juan Humberto CORDERO-Ordonez, a citizen of Guatemala, was read his Miranda Rights and agreed to provide a statement.

CORDERO stated he was to pay 16,000 Quetzals to be smuggled into the United States. After crossing the river along with eight other people, CORDERO claims a foot guide instructed them to walk until they arrived to a road and a car would be waiting. CORDERO stated a female waiting inside the car instructed them to get in. According to CORDERO, the female instructed them to duck down so that Border Patrol would not see them. CORDERO stated the car they boarded was white in color and there was a second car also waiting.

CORDERO identified Muñoz, through a photo lineup, as the female driving the white car.

**MATERIAL WITNESS 3**

Bernabe Ancelmo PEREZ-Romero, a citizen of Guatemala, was read his Miranda Rights and agreed to provide a statement.

PEREZ stated he made smuggling arrangements and was to pay \$65,000 Quetzals. PEREZ stated he crossed the river by raft with approximately nine other individuals and two-foot guides. Once in the United States, PEREZ stated the foot guide instructed them to board into a white car. PEREZ stated three individuals and himself boarded the white car. Once in the car, PEREZ stated a female driver instructed them to duck.